

DOCKET FILE COPY ORIGINAL

ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20056

RECEIVED

MAY - 6 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the) CC Docket No. 96-128
Pay Telephone Reclassification and)
Compensation Provisions of the)
Telecommunications Act of 1996)
)
AirTouch Paging Petition for Waiver)
of Payphone Compensation Obligations)

To: The Commission

**REPLY TO OPPOSITION TO
APPLICATION FOR REVIEW**

AirTouch Paging ("AirTouch"), by its attorneys and pursuant to Section 1.115 of the Commission's Rules, hereby replies to the RBOC/GTE/SNET Payphone Coalition's Opposition to AirTouch's Application for Review^{1/} of the *Memorandum Opinion and Order* issued by the Chief, Common Carrier Bureau (the "Bureau") in the above-captioned proceeding.^{2/} The following is respectfully shown:

The Opposition of the RBOC/GTE/SNET Payphone Coalition (the "Coalition Opposition") fails to address the fundamental arguments raised by AirTouch's

^{1/} Application for Review of AirTouch Paging, CC Docket No. 96-128, filed April 8, 1998.

^{2/} *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, DA 98-181, released March 9, 1998 (the "Bureau Order").

No. of Copies rec'd
List ABCDE

0114

Application for Review and its underlying request for waiver. Rather, the Coalition makes a series of erroneous (and largely irrelevant) assertions in an attempt to obfuscate the issues. In this Reply, AirTouch will respond only to the most significant errors in the Coalition's Opposition.

I. The Coalition Fails to Distinguish Between the Commission's Interim (Per-Phone) and Permanent (Per-Call) Compensation Systems

In its Opposition, the Coalition claims that "two facts" are sufficient to "prove ... that the Commission has always concluded that PSPs are entitled to compensation without regard to the availability of payphone-specific digits." Coalition Opposition at p. 8. First, according to the Coalition, in the *First Payphone Order*^{3/} the Commission established an interim compensation system which did not have as a component the provision of payphone-specific coding digits by PSPs. The Coalition draws the erroneous conclusion that "the Commission [therefore] could not have believed that the availability of coding digits ... [was] a prerequisite to the IXCs' obligation to pay fair compensation." *Id.*

This argument simply misses the mark. The availability of payphone-specific coding digits was established as a prerequisite to PSPs' right to receive compensation not on a per-payphone basis, which was the system established for the interim period, but on a per-call basis, which was the system established to be

^{3/} *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, *Report and Order*, 11 FCC Rcd 20,541 (1996) ("*First Payphone Order*").

implemented on a permanent basis after the expiration of the interim period.^{4/} While it is true that during the interim per telephone compensation period PSPs were not required to transmit coding digits, this does not lead to a conclusion that such a requirement does not exist for per-call compensation.

Moreover, the Coalition overlooks the fact that the Commission expressly stated that the availability of coding digits was a prerequisite to the obligation to pay compensation on a per-call basis.^{5/} But for the fact that the Commission had imposed this condition, the Coalition would not have requested, just one week before its obligation to provisions coding digits was to become effective, a waiver of the condition so that its members could receive compensation. AirTouch's waiver request was predicated on its need for comparable relief in light of the LECs' and PSPs' continued inability to provide coding digits while still demanding per-call compensation. Thus, the interim compensation plan simply is irrelevant to AirTouch's waiver request.

In any event, the Coalition fails to acknowledge that the interim compensation system was held to be arbitrary and capricious by the Court of Appeals,

^{4/} *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, *Order on Reconsideration*, 11 FCC Rcd. 21,233, 21,265-66 (1996) ("*Reconsideration Order*") ("[o]nce per-call compensation becomes effective, ... to be eligible for such compensation, payphones will be required to transmit specific payphone coding digits as a part of their ANI....").

^{5/} *Reconsideration Order*, 11 FCC Rcd. at 21,265-66.

because neither the rate itself nor the decision about who must pay the rate (a decision which did not then affect AirTouch) were supportable.^{6/}

II. Call Blocking Is a Necessary Component of the Commission's Per-Call Compensation System

The second "fact" cited by the Coalition in support of its claim that PSPs are entitled to compensation without regard to the availability of payphone-specific digits is not a fact at all, but rather is the Coalition's own interpretation of an argument made by the Commission before the Court of Appeals in its attempt to defend the payphone compensation decisions. The Coalition attempts to link two unrelated assertions: one — already shown to be erroneous — that the obligation to provision coding digits is not a sine qua non of the right to receive pay per-call compensation, Opposition at p. 8,^{7/} and, two, that if the per-call compensation rate established by the Commission is "fair," then the transmission of coding digits (and hence the ability to block calls) is irrelevant.

^{6/} *Illinois Public Telecommunications Assn. v. FCC*, 117 F.3d 555, 564-65, *clarified on rehearing*, 123 F.3d 693 (D.C. Cir. 1997).

^{7/} The Coalition asserts that "the Commission rejected the claim that the payphone-specific-digit requirement was a sine qua non of the obligation to pay compensation." Opposition at p. 8. In fact, the opposite is true: the Commission stated that "[o]nce per-call compensation becomes effective, ... to be eligible for such compensation, payphones will be required to transmit specific payphone coding digits as a part of their ANI...." *Reconsideration Order*, 11 FCC Rcd. at 21,265-66 (emphasis added). The Coalition's members consistently have acted with the understanding that they must provide coding digits as a condition to their right to receive compensation. In fact, this understanding formed the basis of their own waiver request. The Bureau had the same understanding, as evidenced by its grant of a blanket waiver to the Coalition and others.

Opposition at pp. 8-9.^{8/} The Coalition recites the Commission's assertions to the Court that "per call compensation [should be allowed] to go forward despite a limited waiver of the requirement that certain payphones transmit payphone-specific digits ...^{9/} [b]ecause the default per call compensation rate fairly compensates PSPs for calls actually made on their payphones." Opposition at 8-9 (quoting Brief for the Federal Communications Commission, *MCI Telecomm. Corp. v. FCC*, No. 97- 1675 (D.C.Cir. Feb. 27, 1998), at p. 43).

The Coalition's support for the Commission's argument to the Court that coding digits are not required if the Commission has deemed the per-call rate to be "fair" is misplaced. The Court already has stated that call blocking may be used to avoid whatever "default rate" the Commission has established. When it rejected the interim compensation system in 1997, the Court stated:

^{8/} The Coalition's readiness to cite as "fact" what is merely a legal fiction raises significant questions about the Coalition's entire opposition. The Opposition is replete with additional evidence of the Coalition's approach. For example, at p. 11, the Coalition states: "AirTouch and ITA alike ask the Commission to decide that the Bureau's coding digit waivers 'directly undermine Commission policy.' ITA Application [for Review] at 8; see AirTouch Application [for Review] at 17-19." Notwithstanding the Coalition's "see" reference, AirTouch made no such claim, implicitly or expressly. In fact, the portions of AirTouch's Application for Review cited by the Coalition nowhere refer to the waivers granted by the Bureau to the LECs and PSPs. The purpose of the Application for Review was to explain why the Bureau's failure to also grant a waiver to AirTouch was arbitrary and contrary to law.

^{9/} A portion of the Commission's statement deleted by the Coalition and represented by the ellipsis states "that would facilitate call blocking". Thus, the Commission has conceded a nexus between the transmission of coding digits by the LECs and PSPs, and the ability to block unwanted calls.

[T]he \$.35 rate ... cannot stand. The FCC must now set a new interim rate and decide what is to happen once the interim period is over. The agency may of course elect to use the new interim rate as a 'default rate' at the conclusion of the interim period. If this were done, the PSPs and IXC's could still be left free to depart from the default rate through negotiations (with IXC's having to resort to blocking to gain leverage in any such negotiations).^{10/}

The Court's reasoning is sound, and is consistent with the Court's reliance on the Commission's assurances about the availability of call blocking.^{11/} The Commission's compensation system is based on negotiations between interested parties to determine the appropriate rate at which PSPs will be compensated for completed calls placed from their payphones.^{12/} The requirement to pay the "default" per-call rate applies only when there is no agreement about rates.^{13/} Negotiations are permitted at any time, regardless of what the "default" rate is. The Court understood that call blocking is necessary to gain leverage with a PSP that otherwise would be free to force payment obligations on a buyer who seeks to avoid even the "default" rate — regardless of whether the Commission has deemed that rate to be "fair" under Section 276 of the Communications Act.

^{10/} *IPTA*, 117 F.3d at 565.

^{11/} *See, e.g., id.* at 567.

^{12/} *See* 47 C.F.R. § 64.1300(a).

^{13/} *See* 47 C.F.R. § 64.1300(c), (d).

III. The Coalition Has Failed to Show that the Bureau Has a Rational Waiver Policy

In its Application for Review, AirTouch demonstrated that the *Bureau Order* denying AirTouch's waiver request was not based on a rational waiver policy. AirTouch showed that the Bureau failed to address the changed circumstances that support the waiver, failed to consider the harm to AirTouch, and made other decisional errors, resulting in an arbitrary and capricious decision to deny the waiver request. See Application for Review at pp. 11-19.

In its Opposition, the Coalition erroneously asserts that the Bureau "discussed and refuted AirTouch's arguments in exhaustive detail.... There is simply no argument that the Bureau did not air and refute." Opposition at p. 14 (citing *Bureau Order*, paras. 83-98). Notably, the Coalition did not address any of the specific examples AirTouch provided in its Application for Review.^{14/} Instead, like the *Bureau Order*, the Coalition has substituted conclusory statements for reasoned analysis. This approach is at

^{14/} For example, in its Application for Review, AirTouch showed that the Bureau had conceded that AirTouch would be harmed by denial of a waiver, but had failed to explain why that harm did not warrant relief comparable to that granted to LECs and PSPs. The Coalition does not oppose these showings. Instead, the Coalition takes issue with AirTouch's original showing of harm made in support of the waiver request. Opposition at 13. To the extent the Bureau already has conceded the full extent of the harm to AirTouch, the Coalition's arguments are not appropriately before the Commission because the Coalition did not timely challenge the *Bureau Order*.

odds with the Commission's obligation to give a waiver request a "hard look" and not to treat it in a perfunctory manner.^{15/}

Recent events confirm that the Bureau has not articulated a rational waiver policy. Just three weeks after denying AirTouch a waiver, the Bureau issued an order waiving per-call payment obligations with respect to those payphones that do not transmit payphone-specific coding digits.^{16/} Significantly, the stated basis for the *IXC Waiver Order* is not substantially different from circumstances that AirTouch cited in support of its own waiver request.^{17/} In light of this most recent development, the Commission now must explain how the denial of AirTouch's request is part of a rational waiver policy, and, in particular, why the Commission believes it is "fair" to compensate PSPs for calls that AirTouch (as it explained in its waiver request) seeks to avoid by implementing call blocking.

^{15/} *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

^{16/} CC Docket No. 96-128, *Memorandum Opinion and Order*, DA 98-642 (Com. Car. Bur., rel. April 3, 1998) ("*IXC Waiver Order*").

^{17/} *See, e.g., IXC Waiver Order*, para. 16 (citing "special circumstances ... when payphone-specific coding digits are not available, particularly in light of the waivers granted [to the LECs and PSPs] within the *Bureau Waiver Order* and the *Bureau Coding Digit Waiver Order*."

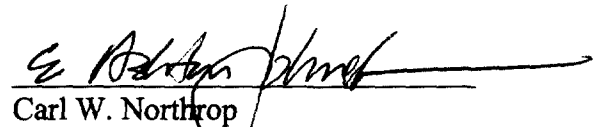
WHEREFORE, the foregoing premises duly considered, AirTouch respectfully requests that the Commission grant AirTouch's Application for Review.

Respectfully submitted,

AIRTOUCH PAGING

Mark A. Stachiw
Vice President & Senior Counsel
AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, TX 75251
Tel: (972) 860-3212

By:


Carl W. Northrop
E. Ashton Johnston
Paul, Hastings, Janofsky & Walker LLP
1299 Pennsylvania Avenue, N.W.
10th Floor
Washington, D.C. 20004-2400
Tel: (202) 508-9500

Its Attorneys

May 6, 1998

WDC-85378v1

CERTIFICATE OF SERVICE

I, Michelle A. Harris, certify that on this 6th day of May, 1998, I caused true and correct copies of the foregoing Reply to Opposition to Application for Review of AirTouch Paging to be sent by first-class United States mail, postage prepaid, or by hand, to the following:

Federal Communications Commission

Daniel M. Armstrong
Laurence N. Bourne
John E. Ingle
Christopher J. Wright
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Federal Communications Commission

Chief, Enforcement Division
Common Carrier Bureau
Stop 1600A, Room 6008
Federal Communications Commission
2025 M Street, N.W.
Washington, DC 20554

International Transcription Service

ITS
1231 20th Street, N.W.
Washington, DC 20036

U.S. Department of Justice

Donald J. Russell
Telecommunications Task Force
Antitrust Division
U.S. Department of Justice
City Center Building
1401 H Street, N.W.
Suite 8000
Washington, DC 20001

U.S. Department of Justice

Robert B. Nicholson
Robert J. Wiggers
U.S. Department of Justice
Antitrust Division
Appellate Section
950 Pennsylvania Avenue, N.W.
Room 3224
Washington, DC 20530-0001

Counsel for the RBOC/GTE/SNET
Payphone Coalition

Michael K. Kellogg
Aaron M. Panner
Kellogg, Huber, Hansen, Todd & Evans,
P.L.L.C.
1301 K Street, N.W.
Suite 1000 West
Washington, DC 20005

Ad Hoc Telecommunications Users
Committee

James S. Blaszak
Janine F. Goodman
Levine, Blaszak, Block & Boothby, L.L.P.
2001 L Street, N.W.
Suite 900
Washington, DC 20036

America's Carriers Telecommunications
Association

Charles H. Helein
Helein & Associates, P.C.
8180 Greensboro Drive
Suite 700
McLean, VA 22102

American Public Communications Council

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.
2101 L Street, N.W.
Washington, DC 20037-1526

Arch Communications Group, Inc.

Kenneth D. Patrich
Carolyn W. Malanga
Wilkinson, Barker, Knauer & Quinn
1735 New York Avenue, N.W.
Suite 600
Washington, DC 20006

AT&T

Mark C. Rosenblum
Richard H. Rubin
Jodie Donovan-May
AT&T
295 North Maple Avenue
Room 325213
Basking Ridge, NJ 07920

AT&T

David Carpenter
Joseph D. Kearney
Sidley & Austin
One First National Plaza
Chicago, IL 60603

Cable & Wireless

Rachel J. Rothstein
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

People of the State of California and the
Public Utilities Commission of the State of
California

Peter Arth, Jr.
Patrick S. Berdge
Lionel B. Wilson
People of the State of California and the Public
Utilities Commission of the State of
California
505 Van Ness Avenue
San Francisco, CA 94102

California Payphone Association

Martin Anthony Mattes
Graham & James
One Maritime Plaza
Suite 300
San Francisco, CA 94111

Communications Central Inc.

Barry E. Selvidge
Communications Central Inc.
1150 Northmeadow Parkway
Suite 118
Roswell, GA 30076

Competition Policy Institute

John Windhausen, Jr.
Competition Policy Institute
1156 15th Street, N.W.
Suite 310
Washington, DC 20036

**Competitive Telecommunications
Association**

Danny E. Adams
Steven A. Augustino
Kelley, Drye, & Warren, L.L.P.
1200 19th Street, N.W.
Suite 500
Washington, DC 20036

**Competitive Telecommunications
Association**

Genevieve Morelli
Competitive Telecommunications Association
1900 M Street, N.W.
Suite 800
Washington, DC 20036

**The Consumer-Business Coalition for Fair
Payphone-800 Fees**

Howard J. Symons
Sara F. Seidman
Yaron Dori
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, PC
701 Pennsylvania Avenue, N.W.
Washington, DC 20004-2608

**The Consumer-Business Coalition for Fair
Payphone-800 Fees**

Daniel R. Barney
Robert Digges, Jr.
ATA Litigation Center
2200 Mill Road
Alexandria, VA 22314

Consumer Federation of America

Mark Cooper
Consumer Federation of America
1424 16th Street, N.W.
Washington, DC 20036

Deerfield Farmers' Telephone Company

Sylvia Lesse
Margaret Nyland
Kraskin, Lesse & Cosson, L.L.P.
2120 L Street, N.W.
Suite 520
Washington, DC 20037

Direct Marketing Association

Heather L. McDowell
Ian D. Volner
Veneable, Baetjer, Howard & Civiletti, L.L.P.
1201 New York Avenue, N.W.
Suite 1000
Washington, DC 20005

Dispatching Parties (America Alpha
Dispatch Services, Inc., Absolute Best
Monitoring, Inc., Affordable Message
Center, Inc., Procommunications, Inc.,
National Dispatch Center, Inc., Abacus,
Inc., United Cellular Paging, Inc., Dispatch
America, Inc., Alphanet, Inc., All Office
Support, Inc.)

Alan S. Tilles
Meyer, Faller, Weisman & Rosenberg, PC
4400 Jenifer Street, N.W.
Suite 380
Washington, DC 20015

Excel Telecommunications, Inc.

Pamela S. Arluk
Dana Frix
Swidler & Berlin, Chtd.
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Frontier Corporation

Michael Shortley
Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

GE Capital Communication Services
Corporation

Meredith Gifford
GE Capital Communication Services Corp.
540 Powers Ferry Road
Atlanta, GA 30339

GE Capital Communication Services
Corporation

Colleen Boothby
Janine F. Goodman
Levine, Blaszak, Block & Boothby, L.L.P.
2001 L Street, N.W.
Suite 900
Washington, DC 20036

General Communications Inc.

Kathy L. Shobert
General Communication Inc.
901 15th Street, N.W.
Suite 900
Washington, DC 20005

Illinois Public Telecommunications
Association

Michael W. Ward
John F. Ward, Jr.
Henry T. Kelly
O'Keefe, Ashenden, Lyons & Ward
30 N. LaSalle Street
Suite 4100
Chicago, IL 60602

Inmate Calling Service Providers Coalition

Robert F. Aldrich
Jacob S. Farber
Albert H. Kramer
Dickstein, Shapiro, Morin & Oshinsky, L.L.P.
2101 L Street, N.W.
Washington, D.C. 20037-1526

International Telecard Association

Glenn B. Manishin
Michael D. Specht
Blumenfeld & Cohen - Technology Law
Group
1615 M Street, N.W.
Suite 700
Washington, DC 20036

IPSP Ad Hoc Committee for Consumer
Choice

Charles H. Helein
Helein & Associates, P.C.
8180 Greensboro Drive
Suite 700
McLean, VA 22102

LCI International Telecom Corp.	<p>Danny E. Adams Steven A. Augustino John J. Heitmann Kelley Drye & Warren L.L.P. 1200 19th Street, N.W. Suite 500 Washington, DC 20036</p>
Maine Public Utilities Commission	<p>Peter G. Ballou Joel B. Shifman Maine Public Utilities Commission 242 State Street State House Station No. 18 Augusta, ME 04333-0018</p>
MCI	<p>Mary J. Sisak Mary L. Brown MCI Telecommunications 1801 Pennsylvania Avenue, N.W. Washington, DC 20006</p>
MCI	<p>Donald B. Verrilli, Jr. John B. Morris, Jr. Jenner & Block 601 13th Street, N.W. Washington, DC 20005</p>
Metrocall, Inc.	<p>Frederick M. Joyce Joyce & Jacobs 1019 19th Street, N.W. 14th Floor PH-2 Washington, DC 20036</p>
Midcom Communications Inc.	<p>Steven P. Goldman Midcom Communications Inc. 26913 Northwestern Highway, Suite 165 Smithfield, MI 48034</p>

Midcom Communications Inc.	Bradley D. Toney Midcom Communications Inc. 1111 Third Avenue Suite 1600 Seattle, WA 98101
Midcom Communications Inc.	Laura H. Phillips Loretta J. Garcia Dow, Lohnes & Albertson, PLLC 1200 New Hampshire Avenue, N.W. Suite 800 Washington, DC 20036-6802
Mississippi Public Service Commission	George M. Fleming Mississippi Public Service Commission 550 High Street Room 1702 Walter Sillers Office State Building Jackson, MS 39201
Mobile Telecommunications Technologies Corp.	Thomas Gutierrez J. Justin McClure Lukas, McGowan, Nace & Gutierrez 1111 19 th Street, N.W. Suite 1200 Washington, DC 20036
National Association of State Utility Consumer Advocates	Michael A. McRae Elizabeth A. Noel Office of the People's Counsel, District of Columbia 1133 15 th Street, N.W. Suite 500 Washington, DC 20005
National Telephone Cooperative Association	David Cosson Marie Guillory National Telephone Cooperative Association 2626 Pennsylvania Avenue, N.W. Washington, DC 20037

NATSO	<p>Lisa Mullings NATSO, Inc. 1199 North Fairfax Street Suite 801 Alexandria, VA 22314-1492</p>
Public Utilities Commission of Ohio	<p>Anne Henkener Public Utilities Commission of Ohio Public Utilities Section 180 East Broad Street 7th Floor Columbus, OH 43215-3793</p>
Oncor Communications, Inc.	<p>Mitchell F. Brecher Fleischman and Walsh, L.L.P. 1400 16th Street, N.W. Washington, DC 20036</p>
PageMart Wireless, Inc.	<p>Phillip L. Spector Partick S. Campbell Paul, Weiss, Rifkind, Wharton & Garrison 1615 L Street, N.W. Suite 1300 Washington, DC 20036</p>
Paging Network, Inc.	<p>Judith St. Ledger-Roty Wendy I. Kirchick Kelley, Drye & Warren, L.L.P. 1200 19th Street, N.W. Suite 500 Washington, DC 20036</p>
Pennsylvania Public Utility Commission	<p>Terrence J. Buda Commonwealth of Pennsylvania Pennsylvania Public Utility Commission P.O. Box 3265 Commonwealth & North Streets Room 203 North Office Building Harrisburg, PA 17105-3265</p>

Peoples Telephone Company, Inc.

Eric L. Bernthal
Michael S. Wroblewski
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, DC 20004

Peoples Telephone Company, Inc.

Bruce W. Renard
Peoples Telephone Company, Inc.
2300 N.W. 89th Place
Miami, FL 33172

Personal Communications Industry
Association

Robert L. Hoggarth
Personal Communications Industry
Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314

Personal Communications Industry
Association

Scott Blake Harris
Kent D. Bressie
Gibson, Dunn & Crutcher, L.L.P.
1050 Connecticut Avenue, NW
Washington, DC 20036-5303

RCN Telecom Services, Inc.

Dana Frix
William B. Wilhelm, Jr.
Swidler & Berlin, Chtd.
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Smartalk

Marianne Townsend
Smartalk
1640 South Sepulveda Blvd.
Suite 500
Los Angeles, CA 90025

Consumer Union,
Southwest Regional Office

Eva King Andries
S. Walter Washington
1804 West 36th Street
Austin, TX 78701

Source One Wireless II, LLC

David L. Hill
Audrey P. Rasmussen
O'Connor & Hannan, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, DC 20006

Sprint Corporation

Leon M. Kestenbaum
Jay C. Keithley
H. Richard Juhnke
Sprint Corporation
1850 M Street, N.W.
11th Floor
Washington, DC 20036

Telaleasing Enterprises, Inc.

Theodore C. Rammelkamp, Jr.
Telaleasing Enterprises, Inc.
601 West Morgan
Jacksonville, IL 62650

Telco Communications Group, Inc.

Dana Frix
Pamela S. Arluk
Swindler & Berlin, Chtd.
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Telecommunications Resellers Association

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
1620 I Street, N.W.
Suite 701
Washington, DC 20006

Teleport Communications Group Inc.

Teresa Marrero
Teleport Communications Group Inc.
Two Teleport Drive
Staten Island, NY 10311

United States Army	SPC Jason M. Kane United States Army 2/82nd AVN P.O. Box 70687 Fort Bragg, NC 28307
United States Telephone Association	Mary McDermott Linda Kent Keith Townsend USTA 1401 H Street, N.W. Suite 600 Washington, DC 20005
Vanguard Cellular	Richard S. Rowlen Vanguard Cellular Systems 2002 Pisgah Church Road Greensboro, NC 27455
Vermont Department of Public Service	Sheldon M. Katz Vermont Department of Public Service 112 State Street Drawer 20 Montpelier, VT 05620-2601
Virginia State Corporation Commission	Robert M. Gillespie Virginia State Corporation Commission Division of Communications 1300 East Main Street 10 th Floor P.O. Box 1197 Richmond, VA 23219
Wisconsin Pay Telephone Association, Inc.	Andrew J. Phillips Yakes, Bauer, Kindt & Phillips 141 North Sawyer Street PO Box 1338 Oshkosh, WI 54902-1338


WorldCom Inc.

Richard S. Whitt
WorldCom Inc.
1120 Connecticut Avenue, N.W.
Suite 400
Washington, DC 20036

WorldCom Inc.

Douglas F. Brent
WorldCom Inc.
9300 Shelbyville Road
Suite 700
Louisville, KY 40222

A. John Yoggerst
9315 Contessa
Bexar County
San Antonio, Texas 78216


Michelle A. Harris